

**LOG OF MEETING
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SUBJECT: F15.53 Subcommittee on Non-Integral Firearm Locking Devices

DATE OF MEETING: February 20, 2002

PLACE OF MEETING: ASTM Headquarters, West Conshohocken, PA

LOG ENTRY SOURCE: Roy W. Deppa, ESME *RW*

COMMISSION ATTENDEES: Roy W. Deppa, ESME

NON-COMMISSION ATTENDEES: See Attached Attendance List

SUMMARY OF MEETING:

The purpose of the meeting was to discuss and decide upon inclusion of various requirement provisions in the proposed voluntary standard for gunlocks.

John Blair, Chairman of the F15 Committee on Consumer Products, has been working on a list of invitees for an organizational meeting for Firearm Lockboxes and Lockdown Devices. A tentative date of April 3, 2002 has been set for this meeting. There was a request from the floor to coordinate the lockbox meetings with the gunlock meetings, as there are some people who will be on both subcommittees.

Roy Deppa reviewed the human factors grip strength data that had been discussed at the November meeting. The data provided by CPSC were drawn from three reference sources, and the major item of interest concerned the appropriate level of grip strength to be used in determining the cable-cutting force. There will be further discussion of this issue pending the results of the fabrication and testing of the proposed cable-cutting fixture.

Danny Diaz, Remington Arms, presented detailed design information on a proposed fixture for the cable-cutting test. This fixture is based upon information from ASME standards for cutting pliers, and is intended to provide reproducible results by eliminating direct human involvement. The design is a two-jaw cutter. A prototype has not been fabricated. Mr. Diaz estimated the cost to produce the fixture at about \$2,000. Ron Borgio, Smith & Wesson, showed a cable-cutting fixture that he had fabricated. This is a one-jawed device that eliminates alignment problems. Mr. Borgio estimated the cost to produce the fixture at about \$500. Charles Hodgdon, Savage Arms, showed a commercially-available bolt-cutter that could be modified slightly to allow application of measured force to the handle. The cost to purchase this device is \$220. The group voted to proceed with the two-jaw device and to have Mr. Diaz fabricate and test a unit.

Joe Bartozzi, Mossberg, presented detailed information on a double rail-guided drop test fixture that is versatile enough to accept various test objects in different orientations. There was a long discussion of the various issues to be considered in setting a drop impact test for cable locks and trigger locks. The device and procedure seem generally acceptable for testing cable locks for resistance to inertial opening. Mr. Bartozzi indicated that the 1-1/2 meter drop test of a trigger lock with the mass of a long gun is a very severe test. Roy Deppa discussed the intent of the CPSC trigger lock tests, which were conducted by impacting the lock with a striking object such as a hammer, as well as by dropping handguns with the lock installed. A motion was made, seconded, and passed unanimously to request CPSC and Mossberg to work together to test the correlation between CPSC's tests and those obtained with Mossberg's apparatus. Discussion of this action item centered around the need for CPSC to re-test a group of samples at the Mossberg facility, and recognition of CPSC's obligation to protect the identity of our test samples.

Ken Green, SAAMI, presented data on the dimensions of the trigger guard area of firearms, which were assembled from manufacturer-provided information. The discussion of these data centered around issues of how representative they are, and how they should be treated statistically in settling on a set of dimensions for a single test fixture for the trigger guard tests. This item was tabled pending a compilation of the data to be done by Adam Weinraub, Pro-Lok.

Roy Deppa, CPSC, presented data on a simple hacksaw test that was performed to test the correlation between hacksawing difficulty and pliers-cutting difficulty. The data indicated a simple comparability, but also suggested high degree of dependence upon the method used to support the cable. The California test, which uses a different method of support, requires the cable to withstand 120 strokes of a hacksaw. The CPSC demonstration showed cables could be cut with from 1 to 8 strokes. A motion was made, seconded, and passed (15 in favor, 10 opposed, 5 abstaining) to drop consideration of the hacksaw test from the proposed standard. The discussion of this motion became somewhat heated, with one participant making a point for the record that another participant had a conflict of interest, in influencing the group to drop a test that would disqualify a product that he distributes.

Roy Deppa, CPSC, made a brief statement concerning a proposal for a flame test, in which he stated that CPSC felt that other test requirements would result in metal locks that would not be defeated by a cigarette lighter flame. He stated that no test work was done to support this conclusion as it seemed obvious, as long as the other tests (e.g. Impact Test) were included and followed the requirements currently under discussion. Consideration of a flame test was dropped by acclamation.

Paul Schildhouse, Master Lock, opened the discussion on number of issues relating to labeling. He recognized the need to make the labeling requirements consistent with the guidance of ANSI Z535 to the extent possible, but in addition, there are a number of other features of the labeling and instructions that were proposed.

Larry Keane, NSSF objected to the initial proposed list of instructions, stating that they were firearms instructions, not lock instructions. The discussion suggested that the group recognized the need to keep the two separate, at the same time noting that their liability concerns require them to include safe firearm handling instructions in the packaging for locks. The group accepted the appropriateness of individual manufacturers including established SAAMI instructions for firearm safety in the packaging.

Mr. Keane suggested the first instruction should be to the effect "Never use this lock on a loaded firearm", in accordance with the firearms industry's position that firearms owners should not store them loaded. Mr. Deppa pointed out that this was a firearm instruction and in accordance with the earlier discussion this was inappropriate. He also stated that it was inappropriate in that it indicated that a firearm that the owner chose to store loaded should not be locked, and this is less desirable than having it locked. Mr. Schildhouse proposed a compromise; the first instruction should be "Unload firearm before installing lock".

There was a consensus to add manufacturer, model, and date code information on the product.

Mr. Deppa offered to have CPSC's Human Factors Division review and offer suggestions to proposed labels, warnings, and instructions.

A Task Group was established to propose requirements as needed to assure that the tests for cable and trigger locks be applied where possible and appropriate to other kinds of non-integral locking devices (e.g. chamber blocking devices).

Adam Weinraub, Pro-Lok, raised an issue concerning language in the Introduction. Currently there is language that states the standard is not applicable to devices intended to deter theft or intentional misuse of firearms. His concern is that a manufacturer may claim to be exempt from the requirements based solely on marketing statements that his device is intended to prevent theft. This issue was tabled until the next meeting.

Paul Schildhouse proposed incorporating successfully completed items into the draft standard available through the website forum, as we go along. The group agreed.

The next meeting will be scheduled pending completion of some of the Task Group assignments.

ASTM will distribute minutes of the meeting.

F15.53 PRE-REGISTRATION LIST
FEBRUARY 20-21, 2002
ASTM HEADQUARTERS, WEST CONSHOHOCKEN, PA

Name	Organization
Barros, Eduardo	Taurus International Mfg Inc.
Bartozzi, Joseph	O.F. Mossberg & Sons Inc
Borgio, Ronald	Smith & Wesson
Bruno, Rebecca	Physicians for Social Responsibility
Cady, Jeff	Mogul Co.
Deppa, Roy	US CPSC
Diaz, Danny	Remington Arms
Fry, Jim	J.R. Fry and Associates
Green, Ken	SAAMI
Hodgdon, Charles	Savage Arms
Hughes, William	Child Guard LLC
Keane, Lawrence	NSSF
Kimbrough, Lisa	Americans for Gun Safety
Lockwood, Chuck	BWE Inc
Miranda, Dick	Adstar, Inc.
Morgan, Kathie	ASTM International
Nelson, Larry	Browning
Peschin, Susan	Consumer Federation of America
Reid Sr., Kevin	Sturm, Ruger & Co.
Rice, Kirk	NIST
Ringers, Derek	Mindring LLC
Ross, Larry	Omega Safety Systems
Saville, Lesa	CA Dept of Justice
Schildhouse, Paul	Master Lock Co.
Waterman, Harold	Marlin Firearms
Weinraub, Adam	Pro-Lok